



FILED

AUG 07 2019

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF OKLAHOMA

Mark C. McCartt, Clerk  
U.S. DISTRICT COURT

19 CV 436 CVE - JFJ

Plaintiff(s)

Case Number: \_\_\_\_\_

Jay Ainsworth  
9159 E.38th St  
Tulsa, OK 74145

Defendant(s)

Diversified Consultants, Inc.

A. Parties

- 1) Jay Ainsworth is a citizen of Oklahoma  
(plaintiff) (state)  
Who previously resides at 9159 E.38th St. Tulsa, OK. 74145  
(mailing address if different from residence)
- 2) Defendant Diversified Consultants, Inc. is a citizen of Jacksonville, FL  
(first defendant) (city/state)  
And is employed as \_\_\_\_\_  
(position and title if any)

B. Jurisdiction

- 1) Northern District of Oklahoma

C. Nature of Case

- 1) Briefly state the background of your case:  
Diversified Consultants, Inc. in error insist that I owe ATT \$1,033.62.

COMPLAINT

ATT's billing department claims that I owe them \$486.12 (account #352121217) for unreturned equipment and \$547.50 (account #250235195) for early termination. Their own IT department claims that I don't owe either of these charges. However, whenever I asked to have a 3 way conversation between the two departments & myself.



**UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF OKLAHOMA**

Plaintiff(s)

Jay Ainsworth  
9159 E.38th St  
Tulsa, OK 74145

Case Number: \_\_\_\_\_

Defendant(s)

Diversified Consultants, Inc.

**COMPLAINT continued**

I was told that the billing department was unable to speak to their own IT department while I was still on the phone. However, they could transfer me over to their IT department & I could speak to them just not while they were still on the phone. The IT department told me that they could see where ATT had sent someone out due to a problem I was having. He went on to say that it was determined that the problem was due to water getting in the lines and that I had cancelled services. Then he said that an individual with Direct TV had come out a couple of days later and fixed the problem. Which led to services being turned on April 24, 2017 but the actual problem was unable to be fixed and services were cancelled again May 16, 2017. He could also see that instead of returning the equipment it had been used to provide me with the new services. When I told the billing department what the IT department had told me. They said that the equipment was not compatible and therefore I had to have had been using additional equipment.

Then July 13, 2017 I received a bill for the account #18275419 from DirectTV / ATT. The bill was for the period 6/19/17 to 7/12/17 in the amount of \$0. They came up with this figure by taking a previous balance of \$244.19 less the \$244.19 for returned equipment (exhibit A). When I received this invoice I contacted ATT's billing department and informed them that I had returned all the equipment. I was told that they would correct their mistake.

Later I received a letter dated 2/7/2018 for account #250235195 from Diversified Consultants, Inc. a debt collector stating that I owed ATT \$547.50 (exhibit B). ATT /DirectTV had changed the account #18275419 to account #250235195. I called Diversified and informed them that a mistake had been made & was told that I would have to talk to ATT. When I called ATT they refused to correct their mistake claiming the charges were for early termination. Diversified Consultants, Inc. sent me another letter dated 7/9/19, account #250235195 for \$547.50 (exhibit C). I wrote Diversified & told them not to send me anymore letters unless they could provide me proof that the debt was valid (exhibit D). They sent me two verification letters. The letter dated 7/26/2019 for account #235250195 said that I owed ATT \$547.50 (exhibit E).

**UNITED STATES DISTRICT COURT**  
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9159 E.38th St  
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Case Number: \_\_\_\_\_

Defendant(s)

Diversified Consultants, Inc.

**COMPLAINT continued**

The other letter dated 7/29/2019 for account #352121217 said that I owed ATT \$486.12 after an adjustment for \$165 that was made 9/19/2018 (exhibit F). When I called ATT about the letters they informed me that the letter for \$486.12 was for unreturned equipment and the letter for \$547.50 was for early termination.

I informed ATT that since they were unable to prevent water from getting into the lines preventing me from getting a clear picture on my TV. That I didn't break this contract but that they had actually broken it. Therefore, I couldn't be expected to pay an early termination fee. I also pointed out that (exhibit A) showed that I had returned all equipment except for the gateway (router & modem) but that none of the equipment was actually returned until services were ended in 2018.

Date: \_\_\_\_\_



Jay Ainsworth  
(Plaintiff)

Ainsworth32@hotmail.com  
(918) 622-4745



## BILLING STATEMENT

PAGE 1 OF 4

Statement Date: 07/13/17

Billing Period: 06/19/17 to 07/12/17

Account #: 18275419

Statement for: JAY AINSWORTH

9159 E 38TH ST

TULSA, OK 74145-3433

**YOUR ACCOUNT IS DISCONNECTED**

## WHAT DO I OWE AND WHEN?

TOTAL DUE:

NO PAYMENT  
DUE

## WHAT IS MY ACCOUNT OVERVIEW?

Previous Balance	\$244.19
Payments Received Since Last Bill	0.00
Balance	244.19
New Charges:	
Other Charges, Adjustments & Taxes	-244.19
Total New Charges	-244.19
TOTAL AMOUNT DUE	\$0.00

This account is no longer active

## WHAT DO I NEED TO KNOW?

- If you haven't returned your leased equipment, an Equipment Non-Return Fee may be reflected on this bill.
- Pay Per View service charges may be added to your account after your equipment is returned.
- Get answers with live chat. From [directv.com/contact](http://directv.com/contact) look for chat icon to start a conversation and get answers fast!

For additional information, see page 2.

## HOW DO I PAY?

It's easy to pay online at  
[directv.com/billpay](http://directv.com/billpay)By mail—send  
remittance belowCall us at 1.800.531.5000  
and say, "Pay my bill"  
Transaction fee may applyBy mobile, text PAY to 21880  
\*Text msg rates may apply

PLEASE FOLD ALONG PERFORATION, DETACH AND RETURN THIS PORTION WITH YOUR PAYMENT

ACCOUNT NUMBER:  
18275419PAYMENT DUE:  
NoneTOTAL DUE:  
\$0.00PAYMENT AMOUNT:  
No action required

☐ Note my change of billing address on reverse side.  
DO NOT WRITE OTHER COMMENTS ON THIS FORM.

AB 01 064270 90951 B 279 A

JAY AINSWORTH  
9159 E 38TH ST  
TULSA, OK 74145-3433

0000000000000000000018275419 2 0028 00000000 00000000 0

pg 4

A





Account #: 18275419  
Statement for: JAY AINSWORTH

**ACCOUNT ACTIVITY**

Billing Period: 06/19/17 to 07/12/17

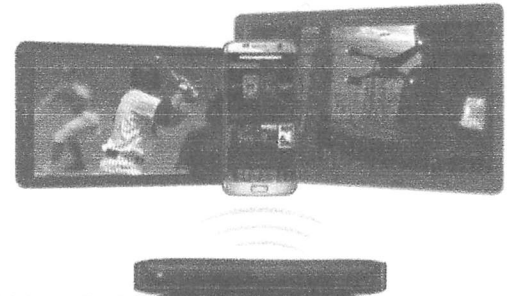
Previous Balance	\$244.19
Payment	0.00
<b>BALANCE</b>	<b>244.19</b>
<b>Non-Return Fees &amp; Taxes</b>	
1. Non Return Fee - Genie Mini adjusted on 06/19	-45.00
2. Non Return Fee - Genie Mini adjusted on 06/19	-45.00
3. Non Return Fee - Genie adjusted on 06/19	-135.00
<b>Taxes</b>	
4. Sales Tax	-19.19
<b>SUBTOTAL</b>	<b>-244.19</b>
<b>Total New Charges</b>	<b>-244.19</b>
<b>TOTAL AMOUNT DUE</b>	<b>\$0.00</b>

**IT'S NOT TOO LATE**

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**1-888-550-1562**  
to come back today.

**It's your TV. Take it with you.**  
Watch your live and recorded shows, anywhere,  
anytime, on your devices—at no extra cost.\*



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[directv.com/download](http://directv.com/download)



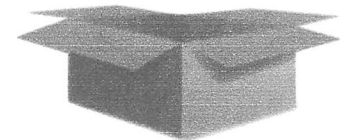
Requires Internet-connected Genie HD44+, streaming w/DIRECTV App & elig. svc. Channels/content vary by pkg. & location. Restr's apply. See next page for DIRECTV App details.

**Equipment Non-Return Fees**

If your account balance includes any  
DIRECTV non-returned equipment charges,  
you must return your  
equipment as soon as  
possible to receive credit.



If you have not received  
a kit, please call us at  
**1.800.531.5000.**

**NEED TO CONTACT US?**

Customer service is available 24 hours a day, 7 days a week:

- Online: [directv.com](http://directv.com)
- Phone: 1.800.531.5000

PO BOX 1391  
SOUTHGATE, MI 48195-0391



**DIVERSIFIED  
CONSULTANTS, INC.**

02/07/18

Creditor: AT&T  
Account Number: 250235195  
Agency Reference Number: 63107720  
Current Balance: \$547.50



Jay Ainsworth  
9159 E 38th St  
Tulsa, OK 74145-3433

This notice is to inform you that your account with AT&T has been referred to our office for collections.

Unless you notify this office within 30 days after receiving this notice that you dispute the validity of this debt, or any portion thereof, this office will assume this debt is valid. If you notify this office in writing within 30 days from receiving this notice that you dispute the validity of this debt, or any portion thereof, this office will obtain verification of the debt or obtain a copy of a judgment and mail you a copy of such judgment or verification. If you request of this office in writing within 30 days after receiving this notice, this office will provide you with the name and address of the original creditor, if different from the current creditor.

Calls to or from this company may be monitored or recorded.

This is an attempt to collect a debt. Any information obtained will be used for that purpose. This communication is from a debt collector.

Sincerely,

Diversified Consultants, Inc.  
PO Box 551268  
Jacksonville, FL 32255-1268  
866-872-8843



**Toll Free: 866-872-8843**



**Hours of Operation:**

Monday – Thursday: 8 AM – 11 PM EST  
Friday: 8 AM – 10 PM EST  
Saturday: 9 AM – 4 PM EST



**Pay Your Bill Online at:**  
[www.dccollect.com](http://www.dccollect.com)

DCI\00108\237346209008

16557\0015183\0

Detach and Return with Payment

**To pay by credit card, please complete the information below:**

Check One: ☐ VISA ☐ MasterCard ☐ AMEX ☐ Check

Card Number:

Expiration Date:     CCV#:    Last 3 digits on back of card

Signature of Cardholder: \_\_\_\_\_

Cardholder Name: \_\_\_\_\_

Cardholder Billing Address: \_\_\_\_\_

\_\_\_\_\_

Creditor: AT&T  
Account Number: 250235195  
Agency Reference Number: 63107720  
Current Balance: \$547.50

**Amount Due: \$547.50**

**Amount Submitted:**

\$



DIVERSIFIED CONSULTANTS, INC.  
PO BOX 551268  
JACKSONVILLE, FL 32255-1268

866-872-8843



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PO BOX 1391  
SOUTHGATE, MI 48195-0391



**DIVERSIFIED  
CONSULTANTS, INC.**

07/09/19

Creditor: AT&T

Agency Reference Number: 77644568

Account Number: 250235195

Balance: \$547.50



Jay Ainsworth  
9159 E 38th St  
Tulsa, OK 74145-3433

19088

*cancelled  
5-20-17  
5-16-17*  
*DTV*  
*serv Early term*

We received your letter disputing the above-referenced account. We have placed the account in dispute status while we gather the information needed to respond your dispute. While we acknowledge and are currently investigating your dispute, federal law requires us to provide the following disclosures within five days after our initial communication with you.

Unless you notify this office within 30 days after receiving this notice that you dispute the validity of this debt, or any portion thereof, this office will assume this debt is valid. If you notify this office in writing within 30 days from receiving this notice that you dispute the validity of this debt, or any portion thereof, this office will obtain verification of the debt or obtain a copy of a judgment and mail you a copy of such judgment or verification. If you request of this office in writing within 30 days after receiving this notice, this office will provide you with the name and address of the original creditor, if different from the current creditor.

Calls to or from this company may be monitored or recorded.

This communication is from a debt collector.

Sincerely,  
Diversified Consultants, Inc.  
PO Box 551268  
Jacksonville, FL 32255-1268  
866-872-8843



**Toll Free: 866-872-8843**



**Hours of Operation:**

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Saturday: 9 AM – 4 PM EST



**Visit Us Online at:**  
[www.dccollect.com](http://www.dccollect.com)

*Pg 7 C*





Date: 7/11/18

Diversified Consultants, Inc.

PO Box 551268

Jacksonville, FL 32255 – 1268

Re: Accounts 121352217 & 250235195

To Whom It May Concern:

I am writing this letter in response to the phone call/letter received from you on 7/16/19. In conformance to my rights under the Fair Debt Collection Practices Act (FDCPA), I am requesting you to provide me with a validation of the debt that you talked of earlier. Please note, this is not a refusal to pay, rather a statement that your claim is disputed and validation is demanded. (15 USC 1692g Sec. 809 (b))

I do hereby request that your office provide me with complete documentation to verify that I owe the said debt and have any legal obligation to pay you.

Please provide me with the following:

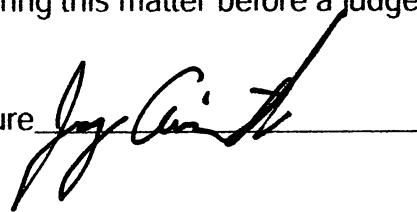
1. Agreement with the creditor that authorizes you to collect on this alleged debt
2. The agreement bearing my signature stating that I have agreed to assume the debt
3. Valid copies of the debt agreement stating the amount of the debt and interest charges
4. Proof that the Statute of Limitations has not expired
5. Complete payment history on this account along with an accounting of all additional charges being assessed
6. Show me that you are licensed to collect in my state; and
7. Your license numbers and Registered Agent

If your office fails to reply to this debt validation letter within 30 days from the date of your receipt, all instances related to this account must be immediately deleted and completely removed from my credit file. Moreover, all future attempts to collect on the said debt must be ceased.

Your non-compliance with my request will also be construed as an absolute waiver of all claims to enforce the debt against me and your implied agreement to compensate me for court costs and attorney fees if I am forced to bring this matter before a judge.

Thanking you,

Your Signature



Your Name Jay Ainsworth

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**DIVERSIFIED  
CONSULTANTS, INC.**

7/26/2019

JAY AINSWORTH  
9159 E 38TH ST  
TULSA, OK 74145-3433

Original Creditor: AT&T  
Current Creditor: AT&T  
Account Number: 235250195  
Agency Reference Number: 77644568  
Balance: \$547.50

We received your request for verification of the above-referenced account. We obtained verification from the creditor confirming that the account information we provided is accurate. Enclosed is additional information provided by the creditor regarding this account.

If you have any questions regarding this account, please contact our office at 866-257-3037.


Calls to or from this company may be monitored or recorded.

This communication is from a debt collector.

Sincerely,  
Diversified Consultants, Inc.  
PO Box 551268  
Jacksonville, FL 32255-1268

**Notice: See Reverse Side for Important Information.**

This communication is from a debt collector.

 Toll Free: 866-257-3037



Monday-Thursday: 8AM-5PM EST  
Friday: 8AM-3PM EST



Pay Your Bill Online at:  
[www.dccollect.com](http://www.dccollect.com)

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**DIVERSIFIED  
CONSULTANTS, INC.**

7/29/2019

JAY AINSWORTH  
9159 E 38TH ST  
TULSA, OK 74145-3433

Original Creditor: AT&T  
Current Creditor: AT&T  
Account Number: 352121217  
Agency Reference Number: 77237269  
Balance: \$486.12

We received your request for verification of the above-referenced account. We contacted the creditor to obtain verification and they provided the enclosed documentation in response to your request. The creditor has verified that the account information we provided is accurate. Customer received a credit adjustment of \$165.00 on 9/19/18. The balance due on your account is shown above.

If you have any questions regarding this account, please contact our office at 866-257-3037.

Calls to or from this company may be monitored or recorded.

This communication is from a debt collector.

Sincerely,  
Diversified Consultants, Inc.  
PO Box 551268  
Jacksonville, FL 32255-1268

**Notice: See Reverse Side for Important Information.**

This communication is from a debt collector.



Toll Free: 866-257-3037



Monday-Thursday: 8AM-5PM EST  
Friday: 8AM-3PM EST



Pay Your Bill Online at:  
[www.dicollect.com](http://www.dicollect.com)

VAL09

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